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Attorneys for Defendants

OCWEN FINANCIAL CORPORATION, OCWEN LOAN SERVICING, LLC  
 and WILLIAM C. ERBEY

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

VICTOR P. GIOTTA and LORALEE GIOTTA,  
 on Behalf of Themselves and All Others  
 Similarly Situated,

Plaintiffs,

vs.

OCWEN FINANCIAL CORPORATION,  
 OCWEN LOAN SERVICING, LLC,  
 ALTISOURCE PORTFOLIO SOLUTIONS  
 S.A., ALTISOURCE SOLUTIONS, INC.;  
 WILLIAM C. ERBEY; and DOEs 1-50.

Defendants.

) Case No. 5:15-cv-00620-BLF  
 ) Hon. Beth L. Freeman  
 )  
 ) **CLASS ACTION**  
 ) **UUCOUAUEUUUXQO**  
 ) **STIPULATION TO EXTEND TIME TO**  
 ) **RESPOND TO SECOND AMENDED**  
 ) **COMPLAINT, MODIFY BRIEFING**  
 ) **SCHEDULE, AND FOR RELIEF**  
 ) **FROM ORDER SETTING CASE**  
 ) **MANAGEMENT CONFERENCE (L.R.**  
 ) **6-1(b), 6-2, 16-2(e))**  
 )  
 )  
 )

Pursuant to Local Rules 6-1(b), 6-2, and 16-2(e), Plaintiffs Victor P. Giotta and Lorealee Giotta (“the Giottas”), Defendants Ocwen Financial Corporation (“OFC”), Ocwen Loan Servicing, LLC, (“OLS”), William C. Erbey (“Erbey”), and Altisource Solutions, Inc. (“ASI”) (collectively, the “Parties”) hereby respectfully stipulate and jointly request that the Court to extend the time for Defendants to respond to the second amended complaint, modify the briefing schedule for the same, and continue the currently scheduled Case Management Conference and ADR Deadlines.

### RECITALS

1. This action was commenced on February 9, 2015. (Dkt. 1).
2. On June 12, 2015, the Giottas filed their Amended Complaint. (Dkt. 41).
3. On June 19, 2015, the Parties filed a Stipulation to Extend Time to Respond to the Amended Complaint, Modify Briefing Schedule, and for Relief from Stipulated Order Setting Case Management Conference. The Court issued an order approving the stipulation and modified schedule on June 22, 2015. (Dkt. 50).
4. On September 17, 2015, the Court held a hearing on the Motions to Dismiss the Amended Complaint filed by OFC and OLS, ASI, and William C. Erbey, and took the motions under advisement. At the hearing, the Court directed the Parties to meet and confer to develop an alternative case management schedule.
5. On September 24, 2015, this Court reset the Case Management Conference for January 7, 2016 at 11:00 a.m. and set the due date for the corresponding Case Management Statement to be due by December 31, 2015. (Dkt. 68).
6. On December 11, 2015, this Court issued its Order 1) denying Defendant Erbey’s motion to dismiss for lack of personal jurisdiction, 2) granting in part and denying in part Defendant Erbey’s motion to dismiss for failure to state a claim, 3) granting in part and denying in part Ocwen defendants’ motion to dismiss for failure to state a claim, and 4) granting defendant ASI’s motion to dismiss for failure to state a claim (“12/11/2015 Order”). (Dkt. 74).
7. Defendants Erbey, OFC, and OLS, read the 12/11/2015 Order to have dismissed all claims contained in the Amended Complaint as to Defendants Erbey, OFC, and OLS.

15. Pursuant to the foregoing, the Parties hereby stipulate and agree to the following modification and request the Court's approval of their stipulation to the proposed briefing and Case Management Schedule as follows:

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Event	Current Date	Stipulated, Requested New Date
Last day for Defendants to move to dismiss the second amended complaint.		2/12/2016
Last day for the Giottas to file oppositions to Defendants' motions to dismiss the second amended complaint.		3/11/2016
Last day for Defendants to file replies in support of motions to dismiss second amended the complaint.		4/1/2016
Hearing on Defendants' motion to dismiss the first amended complaint.		4/14/2016
Last day to meet and confer (Fed. R. Civ. Proc. 26(f) & ADR L.R.3-5), File ADR certification (Civil L.R. 16-8 (b) & ADR L.R. 3-5(b)), and file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference (Civil L.R. 16-8 (c) & ADR L.R. 3-5(b) & (c))	12/16/2015	06/30/2016
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report (FRCivP 26(a) (1)) and file Case Management Statement (Civil L.R. 16-9).	12/31/2015	07/14/2016
Initial Case Management Conference	1/7/2016	07/21/2016

1 FEINSTEIN DOYLE PAYNE & KRAVEC, LLC  
2 DATED: December 29, 2015

3  
4 By: /s/ Joseph N. Kravec, Jr.  
5 Joseph N. Kravec, Jr.  
6 Attorneys for Plaintiffs  
7 Victor P. Giotta and Lorelee Giotta

8 DATED: December 29, 2015 DENTONS US LLP

9  
10 By: /s/ Andrew S. Azarmi  
11 Andrew S. Azarmi  
12 Attorneys for Defendants Altisource Solutions, Inc.

13 DATED: December 29, 2015 LOCKE LORD LLP

14  
15 By: /s/ James C. Magid  
16 James C. Magid  
17 Attorneys for Defendants Ocwen Financial  
18 Corporation, Ocwen Loan Servicing LLC and  
19 William C. Erbey

20 **CERTIFICATION**

21 Pursuant to Local Rule 5-1(i)(3), the filing attorney attests that he has obtained concurrence  
22 regarding the filing of this document from the indicated signatories to the document.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24 Dated: Ö^&^ à^! ÁJÉÖFÍ

25 Beth Labson Freeman  
26 Honorable Beth Labson Freeman  
27 United States District Judge  
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